

PATENT APPLICATION

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE
HONORABLE BOARD OF PATENT APPEALS AND INTERFERENCES

Application of: James G. Shanahan et al.)	
)	Art Unit: 2176
Appl. No.: 09/683,238)	
)	Examiner: Laurie Anne Ries
Filed: 12/05/2001)	

Title: META-DOCUMENT MANAGEMENT SYSTEM WITH PERSONALITY IDENTIFIERS

TO THE COMMISSIONER FOR PATENTS:

Transmitted herewith is the Appellant's Brief in the above-identified application.

- ☒ Charge \$500.00 to Deposit Account No. 24-0025.
- ☒ Please charge any additional fees under 37 C.F.R. §§1.16, 1.17 and 1.21 (but not 1.18) or credit any overpayment to Deposit Account No. 24-0025.
- ☒ Additional papers enclosed: Petition For Extension Of Time.

Respectfully submitted,

/Thomas Zell #37481/

Thomas Zell
Attorney for Appellant
Registration No. 37,481
Telephone: 650-812-4281

Date: September 20, 2007

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE
HONORABLE BOARD OF PATENT APPEALS AND INTERFERENCES**

Application of: James G. Shanahan et al.)	Examiner: Laurie Anne Ries
)	
Appl. No.: 09/683,238)	Art Unit: 2176
)	
Filed: 12/05/2001)	Docket No. A1320-US-NP

**Title: META-DOCUMENT MANAGEMENT SYSTEM WITH PERSONALITY
IDENTIFIERS**

Board of Patent Appeals and Interferences
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

APPEAL BRIEF

Sir:

Appellant respectfully submits this Appeal Brief in the appeal of the present case to the Board of Appeals and Patent Interferences on the Notice dated May 21, 2007.

TABLE OF CONTENTS

	Page
I. REAL PARTY IN INTEREST	1
II. RELATED APPEALS AND INTERFERENCES	2
III. STATUS OF CLAIMS	3
IV. STATUS OF AMENDMENTS	4
V. SUMMARY OF CLAIMED SUBJECT MATTER	5
VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL	7
VII. ARGUMENT	8
A. Overview Of Cited References	8
B. The First Group Of Claims, Consisting Of Claims 1 (And Its Dependent Claims 3-6, 9, and 10), 11 (And Its Dependent Claims 12-14 and 17-18), and 21 (And Its Dependent Claims 22- 26), Is Patentable Over Horowitz '987, Horowitz '647, and Reber	9
C. Conclusion	18
CLAIMS APPENDIX.....	A-1
EVIDENCE APPENDIX.....	B-1
RELATED PROCEEDINGS APPENDIX	C-1

I. **REAL PARTY IN INTEREST**

The real party of interest in the present application is the assignee of the present application, Xerox Corporation.

II. RELATED APPEALS AND INTERFERENCES

There are no related appeals or interferences that are pending. Cross-reference is made to U.S. Patent Application Serial No. 09/683,239, entitled "Meta-Document Management System With Document Identifiers" and U.S. Patent Application Serial No. 09/683,240, entitled "Meta-Document Management System With Transit Triggered Enrichment", which are assigned to the same assignee as the present invention and for which an Appeal Briefs were filed.

III. STATUS OF CLAIMS

Claims 1, 3-6, 9-14, 16-18, and 21-26 are on appeal.

Claims 1, 3-6, 9-14, 16-18, and 21-26 are pending in this application. Of these, claims 1, 11, and 21 are independent claims.

Claims 1, 3-6, 9-14, 16-18, and 21-26 have been finally rejected in an Office Action mailed February 21, 2007 (hereinafter referred to as the "Final Office Action") and supplemented in an Advisory Action mailed May 7, 2007 (hereinafter referred to as the "Advisory Action"), on the grounds further discussed herein.

IV. STATUS OF AMENDMENTS

An amendment filed April 23, 2007 listing the pending claims 1, 3-6, 9-14, 16-18, and 21-26 has been entered in the Advisory Action.

V. SUMMARY OF CLAIMED SUBJECT MATTER

Generally, the subject matter recited in claims 1, 3-6, 9-14, 16-18, and 21-26 concerns a method, apparatus and article of manufacture therefor, for enriching document content, of which claim 1 is discussed as the representative claim of independent claims 1, 11, and 21. The subject matter recited in claim 1 is more fully described in paragraphs 0156-0180, which refer to Figures 5 and 6, of Appellant's specification.

In the method recited in claim 1, a personality identifier is stored on an identification tag. The personality identifier identifies a personality in a personality database. The identified personality is associated with a set of document service request that may be used to recognize and annotate entities in identified content, such as a document, in accordance with an enrichment theme. (See Appellant's specification paragraphs 0124, 0153-0154, and 0059.)

Further in the method recited in claim 1, a reader is used to record (a) the personality identifier from the identification tag (see Appellant's specification paragraph 0161) and (b) context information (see Appellant's specification paragraph 0164). The context information recorded with the reader includes time information identifying *when* the personality identifier is recorded with the reader and position information identifying *where* the personality identifier is recorded with the reader (see Appellant's specification paragraph 0164). For example, in one embodiment illustrated in Figure 5, the reader is illustrated as tag reader 506 and the identification tag is illustrated as electronic identification tag 502 (see Appellant's specification paragraph 0161).

In addition in the method recited in claim 1, document content is identified using the recorded context information and document content accessed with the reader. That is, document content is identified based on when and where the personality identifier is recorded with the reader and when and where document content is accessed with the reader (see Appellant's specification paragraph 0165). In this way, personality identifiers recorded by a reader are associated with document content.

Finally in the method recited in claim 1, the identified document content and personality identifier are transmitted to a meta-document server, at which the

personality identifier is associated with a personality in the database of personalities, the identified content is enriched using the set of document service requests that are defined by the associated personality, and the enriched document content is made available (see Appellant's specification paragraphs 0169-0170).

VI. GROUND OF REJECTION TO BE REVIEWED ON APPEAL

Claims 1, 3-6, 9, 11-14, 16-18, and 21-26 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Horowitz et al., U.S. Patent No. 6,122,647 (hereinafter referred to as "Horowitz '647") in view of Horowitz et al., U.S. Patent No. 6,236,987 (hereinafter referred to as "Horowitz '987"), and Reber et al., U.S. Patent No. 5,986,651 (hereinafter referred to as "Reber").

Claim 10, which depends from independent claim 1, stands rejected under 35 U.S.C. §103(a) as being unpatentable over Horowitz '647 in view of Horowitz '987 and Reber as applied to claim 1, and further in view of Keith Jr., U.S. Patent Application Publication 2002/0032672 (hereinafter referred to as "Keith").

VII. ARGUMENT

Appellant respectfully traverses the rejection of the pending claims and submits they are in condition for allowance for the reasons set forth below.

A. Overview Of Cited References

In this section A, Appellant summarizes the references relied on in the Final Office Action in rejecting the claims on appeal. The Final Office Action relies on Horowitz '987, Horowitz '647, and Reber in rejecting independent claim 1 as discussed below as the representative claim for group 1 in section B below. In addition, as noted in section B.4 below, Keith is relied on in rejecting claim 10, which depends from claim 1 and forms part of the first group.

A.1 Summary of Horowitz '647

Generally, Horowitz '647 discloses a method for creating contextual hyperlinks in a source document, where the hyperlinks associate the source document with available target documents. The method includes selecting terms relevant to the user through linguistic analysis, from which relevant target documents are identified. A tagging module receives user selected portions of a document and selects terms to be used for establishing contextual links. A presentation module identifies topics in the knowledge base associated with the selected terms, and creates hyperlinks between the terms in the source document and target documents. (See Horowitz '647 Abstract.)

A.2 Summary of Horowitz '987

Generally, Horowitz '987 discloses an information retrieval system and method that dynamically organizes content retrieved in response to user input queries. The system operates on a document collection, in which each document is associated with one or more topics that have arbitrary semantic relationships with each other. In response to a query which may include topic terms, an initial set of documents is selected from the document collection. The documents in the initial set are organized by the topic arrangement, which organization may then be used to narrow or broaden the initial query. Four types of topic arrangements are possible – supertopics (has topics that are associated with all of the documents of the current document set), subtopics (has a selection of topics that provide the best coverage

over the current document set), perspective topics (selects topics other than query topics), and theme topics (expresses a subject or a concept describing the document set). (See Horowitz '987 col. 2, line 65 to col. 7, line 34.).

A.3 Summary of Reber

Generally, Reber discloses a network navigation device which includes machine-readable data with an instruction for linking to a resource in an electronic network (see Reber Abstract). The machine readable data can include instructions which direct a network access apparatus to execute any combination of: a predetermined client routine (e.g., a predetermined Internet browser routine), a predetermined network provider access routine (e.g., a dialing and logging on to a predetermined service provider), and navigation instructions for automatically linking the network access apparatus to an electronic address via an electronic network (see Reber column 4, line 61 to column 5 line 2).

A.4 Summary of Keith

Generally, Keith discloses a method for performing a search of a database to generate matching items in the database, where a matching item representing a node within a directory tree structure is formatted into an encyclopedia-like entry (see Keith paragraph 0022, on page 3). More specifically, Keith describes coupling a notification module to a saved search module to notify users of desired information that has been added to a searchable database (see Keith paragraph 0083, on page 9). As an example, announcements related to a particular model of car are pushed by the notification module to car dealerships that would like to receive that information as it is added to the searchable database (see Keith paragraph 0095, on page 11).

B. The First Group Of Claims, Consisting Of Claims 1 (And Its Dependent Claims 3-6, 9, and 10), 11 (And Its Dependent Claims 12-14 and 17-18), and 21 (And Its Dependent Claims 22-26), Is Patentable Over Horowitz '987, Horowitz '647, and Reber

In this section, Appellant traverses the rejection of the first group of claims, consisting of claims 1 (And Its Dependent Claims 3-6, 9, and 10), 11 (And Its Dependent Claims 12-14 and 17-18), and 21 (And Its Dependent Claims 22-26), as being obvious under 35 U.S.C. §103(a) over Horowitz '987, Horowitz '647, and

Reber. For the purpose of discussion presented in this section, claim 1 is discussed as a representative claim of the group, which includes independent claims 11 and 21. The issues on appeal discussed in sections B.1 and B.2 concern the rejection of claim 1 set forth on pages 2-5 of the Office Action and further comments on page 2 of the Advisory Action. In addition, section B.3 addresses the rejection of dependent claim 10 as being obvious under 35 U.S.C. §103(a) over Horowitz '987 in view of Horowitz '647, Reber, and Keith as it may apply to claim 1.

B.1 Recording, With A Reader, Context (Time and Position) Information That Identifies When And Where A Personality Identifier Is Recorded With The Reader Is Not Disclosed or Suggested

Appellant submits that neither Horowitz '987, Horowitz '647, or Reber taken singly or in combination disclose or suggest as recited in Appellant's independent representative claim 1 *recording context information with a reader when a personality identifier is recorded, which context information includes (a) time information identifying when the personality identifier is recorded with the reader and (b) position information identifying where the personality identifier is recorded with the reader.*

B.1.a As To Contextual Information Related To Time

The Final Office Action acknowledges on page 3, lines 20-22 that Horowitz '647 fails to disclose a method in which personality identifiers are assigned based on time information and position information, yet maintains on page 4, lines 1-9, of the Office Action that Reber (at Column 14, lines 60-67, Column 15, lines 1-8, and Column 16, lines 29-35) discloses a method in which context information is recorded including a time of year *during which data is recorded by the reader*. Further, the Advisory Action on page 2, paragraphs 2 and 4, alleges that Reber discloses that "machine-readable data *may include* a date and a time at which the resources were visited or the network navigation device was produced (See Reber, Column 16, lines 29-35)" and that the "machine-readable data *recorded in* a header or footer of an image may include a date and a time at which the resources were visited or the

network navigation device was produced (See Reber, Column 14, lines 60-67, Column 15, lines 1-8, and Column 16, lines 29-35)" (emphasis added).

Appellant respectfully disagrees with the interpretation and application of Reber to the recited elements of claim 1 asserted in the forgoing reproduced portions of the Final Office Action and the Advisory Action. Appellant submits that the forgoing passage of Reber cited in the Final Office Action and the Advisory Action, which are reproduced below, fail to disclose or suggest including in *machine readable data* made available on a network navigation device the date and time at which a resource was visited or the hardcopy output was printed as alleged in the Final Office Action and Advisory Action. Instead as highlighted in the sections of Reber reproduced below, Reber discloses and shows in the corresponding Figure that "additional data" in "human-viewable" form is distinct from "machine-readable data" appearing on the network navigation device as disclosed and illustrated by Reber.

The *machine-readable data* 190 has the form of printed data, such as a one-dimensional or a two-dimensional bar code. Although the machine-readable data 190 can be located anywhere on the sheet 188, it is preferred that the machine-readable data 190 be printed near any peripheral edge 192 of the sheet 188. More preferably, the machine-readable data 190 is printed in either a header 194 or a footer 196 of the sheet 188. In the embodiment illustrated in FIG. [14], the machine-readable data 190 is printed on a left side of the footer 196.

Additional information can also be printed in the header 194 and the footer 196 of the sheet 188. The additional information can include a *human-viewable form* 198 of the electronic address, a page number 200 for the sheet 188, a date 202 and a time (not illustrated) at which the resource was visited or the hard copy output was printed.

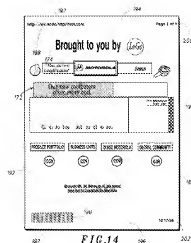


FIG. 14

Reber, Column 14, lines 60-67, Column 15, lines 1-8, which refers to Figure 14. Emphasis added.

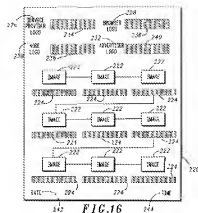
More specifically, Reber fails to disclose or suggest in the recited passages that machine-readable data that is used for accessing a network resource may constitute additional information. For example at column 14, lines 56-59 of Reber discloses with respect to machine-readable data that: "The hard copy output further includes machine-readable data 190 for linking to the resource. The machine-readable data 190 allows the end user or another user to quickly re-link to the resource using the hard copy output." Accordingly, Reber fails to teach or suggest in the recited passages that

additional information, which includes time and date information rendered in a human-viewable form on the a network navigation device, forms part of the machine readable data as alleged in the Final Office Action and Advisory Action.

Similarly with respect to the disclosure in Reber, at column 16, lines 29-35, which refers to Figure 17 reproduced below, Reber also discloses at, column 16, lines 14-19 that: "The machine-readable data 236 can provide instructions for executing the client routine, for downloading the client routine from the electronic network 20, [] for obtaining information about the client routine from the electronic network 20." Reber describes a "client routine" as, for example, "an Internet or intranet browser routine" (see column 3, lines 50-51) and a routine "to display [] content of [a] resource" (see column 6, lines 28-29) or a "graphical user interface routine" (see column 13, line 5).

Preferably, each item of the machine-readable data 234, 236, 238, and 240 has the form of printed data, such as a one-dimensional or a two-dimensional bar code.

Additional information can also be printed on the sheet 220, such as a date 242 and a time 244 at which the plurality of resources was visited or the network navigation device was produced.



Reber, Column 16, lines 29-35, which refers to Figure 17. Emphasis added.

Moreover, in Reber the date/time information (shown at 202 and 242/244 in Figures 14 and 16 reproduced above, respectively) is recorded on the network navigation device (shown at 192 and 220 in Figures 14 and 16 reproduced above, respectively) *when the network navigation device is created; not when the network navigation device is used* (i.e., when the machine readable data on the network navigation device is read with a reader). That is, the human visible date/time information rendered on the network navigation device sets forth information concerning the creation of the network navigation device (e.g., (a) when a network resource was visited or (b) when the network navigation device was produced (see Reber column 15, lines 7-8 and column 16, lines 33-35)). Reber in the cited

passages fails to disclose or suggest that human visible date/time information may be read by a reader for the purpose of recording context information.

In contrast, Appellant's claim 1 recites that *the recording of context information* (such as time information) occurs *when a personality identifier is recorded from an identification tag*. Thus, the date and time information printed in the header or footer of a network navigation device disclosed in Reber fails to disclose or suggest recording time information with a reader for the purpose of recording contextual information, as recited in claim 1. Instead as noted above, Reber teaches that human-viewable data printed in a header or footer of a network navigation device may include a date and a time *at which* network resources *were visited* or the network navigation device *was produced*; not the date and time at which machine-readable data is recorded from a network navigation device.

In summary, Reber fails to disclose or suggest as alleged in the Final Office Action and the Advisory Action that *human-readable* date and time information printed in the header or footer of a network navigation device be either *included or recorded* in *machine-readable* data printed thereon. Instead, the machine-readable data printed on a network navigation device once read is used, for example, to identify a URL for linking to a routine for accessing a network resource.

B.1.b As To Contextual Information Related To Position

The Final Office Action acknowledges on page 3, lines 20-22 that Horowitz '647 fails to disclose a method in which personality identifiers are assigned based on time information and position information, yet maintains on page 4, lines 1-9, of the Final Office Action that Reber (at Column 15, lines 52-62 [reproduced below], Column 16, lines 29-36, Figure 14 [reproduced above], Column 14, lines 60-67 [reproduced above], and Column 15, lines 1-2 [reproduced above]) discloses a method in which position information is recorded, such as the location of machine-readable data in relation to the substrate (i.e., the location within the header or footer of the page).

For each of the plurality of resources, the network navigation device includes a human-viewable image 222 and machine-readable data 224. Each human-viewable image 222 indicates its respective resource to the end user 28, while each machine-readable data 224 provides an instruction to link to the resource. Each machine-readable data 224 has the form of printed data, such as a one-dimensional or a two-dimensional bar code. The human-viewable image 222 and the machine-readable data 224 for the plurality of resources may be arranged sequentially in accordance with a sequence in which the plurality of resources was visited.

Reber, Column 15, lines 52-62 (which refers to Figure 16, reproduced above).

Appellant respectfully disagrees with the interpretation and application of Reber to the recited elements of claim 1 asserted in the forgoing passage recited in the Final Office Action. Appellant submits that the forgoing passage recited in the Final Office Action, which are reproduced above, fail to disclose or suggest Appellant's claimed element recited in claim 1 of recording position information with a reader, where the position information *includes information identifying where the personality identifier is recorded with the reader.*

More specifically, positional information disclosed or suggested in the passages of Reber recited in the Final Office Action, reproduced above, do not concern the recording of position information with a reader for the purpose of recording contextual information as recited in Appellant's claim 1, instead the recited passages of Reber concern the position of information rendered on a network navigation device.

B.1.c Summary

For the forgoing reasons presented in sections B.1.a related to time and B.1.b related to position, Appellant submits that Horowitz '987, Horowitz '647, or Reber taken singly or in combination fail to disclose or suggest as recited in Appellant's independent representative claim 1 *recording context information with a reader when a personality identifier is recorded, which context information includes (a) time information identifying when the personality identifier is recorded with the reader and (b) position information identifying where the personality identifier is recorded with the reader.*

B.2 Identifying Document Content Based On When And Where (i) A Personality Identifier Is Recorded With The Reader And (ii) Document Content Is Accessed With The Reader, Is Not Disclosed or Suggested

Appellant submits that neither Horowitz '987, Horowitz '647, or Reber taken singly or in combination disclose or suggest as recited in Appellant's independent representative claim 1 the identification of document content based on when and where (i) a personality identifier is recorded with the reader and (ii) document content that is accessed with a reader. The Final Office Action (on page 4, second paragraph) and the Advisory Action (on page 2, third paragraph) allege that Reber, at column 16, lines 25-28, and column 7, lines 59-63, reproduced below, teach Appellant's limitations recited in claim 1:

The machine-readable data 56 includes a bar code representation of a first URL for the node which provides the linking service (in particular, <http://link.node/>), and a second URL for the Motorola home page on the World Wide Web (in particular, <http://mot.com>). It is noted that the URL of <http://link.node/> is a fictitious URL, and is utilized for purposes of illustration only. If desired, a printed, human-viewable representation 59 of any of the machine-readable data 56 can be supported by the substrate 50. [Reber column 7, lines 59-63]

Proximate to the human-viewable image 232 is machine-readable data 240 associated with the advertiser. The machine-readable data can provide instructions for linking to a resource associated with the advertiser. [Reber column 16, lines 25-28]

The Advisory Action on page 2, third paragraph, submits that the recited passages of Reber disclose that "the machine-readable data can provide information identifying document content, such as instructions for linking to a resource associated with the advertiser". However, the forgoing passages of Reber fail to disclose as claimed by Appellant the identification of document content based on when and where (i) a personality identifier is recorded with a reader and (ii) document content is accessed with the reader (as described at paragraph 0165 of Appellant's specification discloses, "a personality identifier read by tag reader 506 is assigned to each document or document token recorded on the tag reader 506 based on the time and/or region its content was last accessed and/or modified relative to the time and/or region the personality identifier is located").

In summary, while Reber discloses that machine-readable data recorded on a network navigation device may be used to access a network resource identifying

document content, Reber fails to disclose or suggest in the sections cited in the Final Office Action and the Advisory Action recited above to use a reader of the network navigation device to identify document content, based on when and where (i) a personality identifier is recorded with a reader and (ii) document content is accessed with the reader, as claimed by Appellant in independent claim 1.

B.3 Recording A Personality Identifier With A Reader Together With Context Information, Is Not Disclosed or Suggested

The Final Office Action combines Horowitz '647 and Horowitz '987 with Reber to assert that the elements of claim 1 as a whole are disclosed. As stated in the Final Office Action at page 3, last paragraph, Horowitz '647 "does not disclose assigning different personality identifiers including time information and position information, recorded with an electronic tag reader". Reber taken in combination with Horowitz '647 and Horowitz '987 is therefore misplaced as the elements of claim 1 when read as a whole recite a method for enriching document content with a personality identifier recorded from an identification tag with a reader and identifying content with the reader, which identified content is enriched using a personality identified by the personality identifier.

Instead, Reber concerns as set forth above in sections B.1 and B.2 the rendering of machine readable data and data in a human-viewable form on a network navigation device, which machine readable data may be read with a reader to access a network resource. Given Reber fails to disclose or suggest as set forth above in sections B.1 and B.2 the recording of contextual information including time and position information, Reber taken together with Horowitz '647 and Horowitz '987 also fail to disclose or suggest recording a personality identifier associated with a database of personalities identifying enrichment themes.

B.4 Keith Does Not Pertain To The Elements Of Claim 1

Appellant submits that the rejection of claim 10, as being obvious under 35 U.S.C. §103(a) over Horowitz '647 in view of Horowitz '987 and Reber and further in view of Keith does not pertain to the elements recited in claim 1. The specific section of Keith relied on in the Final Office Action in rejecting claim 10 includes paragraph

0092 on pages 10-11, which describes the use of push technology “in response to a saved search by a specific user” (see Keith paragraph 0092, on pages 10-11).

The disclosure in Keith related to the notification of desired information whether taken singly or in combination with Horowitz '647 and/or Horowitz '987 and/or Reber fails to disclose or suggest Appellant's claimed limitations recited in claim 1 taken as a whole, which includes recording context information (both time and position) and identifying document content based on when and where (i) a personality identifier is recorded with a reader (from an identification tag) and (ii) document content is accessed with the reader. As discussed above as in section A.4, notification in Keith concerns the notification when additions are made to a searchable database, not when document content is enriched as recited in claim 1.

B.5 Summary

For the reasons presented above Horowitz '987, Horowitz '647, and Reber taken singly or together thus fail to disclose or suggest, Appellant's invention recited in independent claim 1 which sets forth a method for enriching content of a document by recording a personality identifier from an identification tag with a reader, recording context information with the reader including time and position information relating to when and where the personality identifier is recorded with the reader. The reading device identifies document content based on when and where the personality identifier is recorded with the reader and document content accessed with the reader. The identified document content and recorded personality identifier are transmitted to a meta-document server for enrichment to be performed according to an enrichment theme of a personality identified by the recorded personality identifier.

Accordingly, in view of these and other distinguishing features of Appellant's claimed invention recited in claim 1 that are discussed above, claim 1 is believed to be patentably distinguishable over Horowitz '987, Horowitz '647, and Reber.

In addition, it should be noted that claim 1 contains the same or very similar limitations to those discussed above with respect to claims 11 and 21, and therefore the argument presented above with regard to claim 1 applies equally to claims 11 and 21.

Insofar as dependent claims 3-6, 9, 12-14, 16-18, and 22-26 are concerned, these claims depend from and incorporate all of the limitations of one of now presumably allowable independent claims 1, 11, and 21 and are also believed to be in allowable condition.

C. Conclusion

Based on the arguments presented above, claims 1, 3-6, 9, 11-14, 16-18, and 21-26 are believed to be in condition for allowance. Appellant therefore respectfully requests that the Board of Patent Appeals and Interferences reconsider this application, reverse in whole the rejection of claims 1, 3-6, 9, 11-14, 16-18, and 21-26, and pass this application for allowance.

Respectfully submitted,

/Thomas Zell #37481/

Thomas Zell
Attorney for Appellant
Registration No. 37,481
Telephone: 650-812-4281

Date: 9/20/07

CLAIMS APPENDIX

CLAIMS INVOLVED IN THE APPEAL:

1. A method for enriching document content, comprising:

storing on an identification tag a personality identifier that is machine readable; the personality identifier identifying a personality in a database of personalities;

recording the personality identifier from the identification tag with a reader;

recording context information with the reader when the personality identifier is recorded; the recorded context information recorded with the reader including time information and position information, which time information includes information identifying when the personality identifier is recorded with the reader and which position information includes information identifying where the personality identifier is recorded with the reader;

identifying document content with the reader using (i) the recorded context information and (ii) metadata recorded recording when and where document content is accessed with the reader; said identifying of document content being based on when and where (i) the personality identifier is recorded with the reader and (ii) document content is accessed with the reader;

transmitting from the reader the identified document content and the recorded personality identifier to a meta-document server;

associating at the meta-document server the personality identifier with a personality in a database of personalities;

enriching at the meta-document server the identified document content using a set of document service requests identifying enrichment themes that are defined by the associated personality; said enriching recognizing and annotating entities in the identified document content related to the enrichment themes of the associated personality; and

making at the meta-document server the enriched document content available.

3. The method according to claim 1, wherein the meta-document server upon receipt of the identified document content and the recorded personality identifier further comprises:

- associating the recorded personality identifier with the identified document content;
- recognizing, with at least a first method, an entity in the identified document content;
- accessing, with at least a second method, a document service using the recognized entity;
- annotating the identified document content with output from the document service to define enriched document content; and
- making the enriched document content available to a set of one or more users.

4. The method according to claim 1, wherein the reader includes a transmitter and a receiver for communicating with the identification tag to record the personality identifier.

5. The method according to claim 1, wherein the reader records the personality identifier with a scanner from embedded data recording the identification tag on a hardcopy document.

6. The method according to claim 4, wherein the reader is a mobile computing device.

9. The method according to claim 1, wherein the recorded context information is a timestamp that records when the recording took place and a position identifier that identifies a position of a physical object.

10. The method according to claim 1, further comprising providing notification that the enriched document content is available.

11. A system for enriching document content, comprising:

- an identification tag storing a personality identifier that is machine readable;
- a reader for recording the personality identifier from the identification tag; the reader recording context information when the personality identifier is recorded and identifying document content using the recorded context information; and

a meta-document server for receiving from the reader the recorded personality identifier and the identified document content, associating the personality identifier with a personality in a database of personalities, enriching the identified document content using a set of document service requests identifying enrichment themes that are defined by the associated personality, and making the enriched document content available;

wherein the meta-document server recognizes and annotates entities in the identified document content related to the enrichment themes of the associated personality;

wherein the context information recorded with the reader includes time information and position information, which time information includes information identifying when the personality identifier is recorded with the reader and which position information includes information identifying where the personality identifier is recorded with the reader;

wherein the reader identifies document content using (i) the recorded context information and (ii) metadata recorded recording when and where document content is accessed with the reader, which identification of document content is based on when and where (i) the personality identifier is recorded with the reader and (ii) document content is accessed with the reader.

12. The system according to claim 11, wherein the reader includes a transmitter and a receiver for communicating with the identification tag to record the personality identifier.

13. The system according to claim 11, wherein the reader records the personality identifier with a scanner from embedded data recording the identification tag on a hardcopy document.

14. The system according to claim 12, wherein the reader is a mobile computing device.

16. The system according to claim 17, wherein the recorded context information is a timestamp that records when the recording took place and a position identifier that identifies a position of a physical object.

17. The system according to claim 11, wherein the meta-document server upon receipt of the identified document content and the recorded personality identifier:

- associates the recorded personality identifier with the identified document content;

- recognizes, with at least a first method, an entity in the identified document content;

- accesses, with at least a second method, a document service using the recognized entity;

- annotates the identified document content with output from the document service to define enriched document content; and

- makes the enriched document content available to a set of one or more users.

18. The system according to claim 14, wherein the meta-document server provides notification that the enriched document content is available.

21. An article of manufacture for enriching document content, the article of manufacture comprising computer usable media including computer readable instructions embedded therein that causes a plurality of computers to perform a method, wherein the method comprises:

- storing on an identification tag a personality identifier that is machine readable; the personality identifier identifying a personality in a database of personalities;

- recording the personality identifier from the identification tag with a reader;

- recording context information with the reader when the personality identifier is recorded; the recorded context information recorded with the reader including time information and position information, which time information includes information identifying when the personality identifier is recorded with the reader and which position information includes information identifying where the personality identifier is recorded with the reader;

- identifying document content with the reader using (i) the recorded context information and (ii) metadata recorded recording when and where document content is accessed with the reader; said identifying of document content being based on

when and where (i) the personality identifier is recorded with the reader and (ii) document content is accessed with the reader;

transmitting from the reader the identified document content and the recorded personality identifier to a meta-document server;

associating at the meta-document server the personality identifier with a personality in a database of personalities;

enriching at the meta-document server the identified document content using a set of document service requests identifying enrichment themes that are defined by the associated personality; said enriching recognizing and annotating entities in the identified document content related to the enrichment themes of the associated personality; and

making at the meta-document server the enriched document content available.

22. The article of manufacture according to claim 21, wherein the meta-document server upon receipt of the identified document content and the recorded personality identifier the method further comprises:

associating the recorded personality identifier with the identified document content;

recognizing, with at least a first method, an entity in the identified document content;

accessing, with at least a second method, a document service using the recognized entity;

annotating the identified document content with output from the document service to define enriched document content; and

making the enriched document content available to a set of one or more users.

23. The article of manufacture according to claim 21, wherein the reader records the personality identifier with a scanner from embedded data recording the identification tag on a hardcopy document.

24. The article of manufacture according to claim 21, wherein the recorded context information is a timestamp that records when the recording took place and a position identifier that identifies a position of a physical object.

25. The article of manufacture according to claim 21, wherein the method further comprises providing notification that the enriched document content is available.

26. The article of manufacture according to claim 21, wherein the reader includes a transmitter and a receiver for communicating with the identification tag to record the personality identifier.

EVIDENCE APPENDIX

NONE

RELATED PROCEEDINGS APPENDIX

NONE